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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**
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15 IN RE HIGH-TECH EMPLOYEE ANTI-
TRUST LITIGATION

16 THIS DOCUMENT RELATES TO:

17 ALL ACTIONS

Master Docket No. 11-CV-2509 LHK

**[PROPOSED] ORDER GRANTING
DEFENDANTS' JOINT ADMINISTRATIVE
MOTION TO SEAL**

Having considered Defendants' Joint Administrative Motion to Seal and the Declarations submitted in support of that motion, having determined that public disclosure of the confidential information described therein would harm Defendants, and finding compelling reasons to seal that information, IT IS HEREBY ORDERED THAT Defendants' Joint Administrative Motion is GRANTED.

Defendants shall file under seal the following:

EXHIBITS ACCOMPANYING DECLARATION OF ANNE SELIN IN SUPPORT OF GOOGLE INC.'S MOTION FOR SUMMARY JUDGMENT

Exhibit to Lin W. Kahn ISO Motion to Seal	Title	Filed Under Seal/ Redacted
A	Google Inc.'s Motion for Summary Judgment, filed on January 9, 2014.	Redacted
B	Exhibit 15 to the Selin Decl., Presentation: "Hiring GBS," bearing bates number GOOG-HIGH-TECH-00433305	Redacted
C	Exhibit 16 to the Selin Decl., Chart: "Top 25 New Hire Previous Employers," bearing bates number GOOG-HIGH-TECH-00258494.	Redacted
D	Exhibit 17 to the Selin Decl., Document: "Google Leadership Development and Compensation Committee," dated January 30, 2008, bearing bates number 00223682.R	Redacted
E	Exhibit 18 to the Selin Decl., Presentation entitled "Sourcing Diagnostic," bearing bates number GOOG-HIGH-TECH-00024150.	Redacted
F	Exhibit 19 to the Selin Decl., "Startup Talent Competition," bearing bates number GOOG-HIGH-TECH-00193360.R.	Redacted
G	Exhibit 32 to the Selin Decl., Document: "Gentleman's Agreements," bearing bates number LUCAS00195586.	Filed Under Seal

1	V	Exhibit 33 to the Selin Decl., Expert Report of Kevin M. Murphy, Ph.D, with revised exhibits, dated Au- gust 25, 2013: • Exhibit 2B	Redacted
2	H	Exhibit 34 to the Selin Decl., Expert Report of Lauren J. Stiroh, No- vember 25, 2013: • Exhibit IV.1	Filed Under Seal
3	W	Exhibit 35 to the Selin Decl., Expert Report of Kevin M. Murphy, Ph.D, with revised exhibits, dated No- vember 12, 2012: • Appendix 1A	Filed Under Seal
4	X	Exhibit 36 to the Selin Decl., Expert Report of Kevin M. Murphy, Ph.D, with revised exhibits, dated No- vember 12, 2012: • Appendix 1B	Filed Under Seal

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13 **EXHIBITS ACCOMPANYING DECLARATION OF VICTORIA WEATHERFORD IN**
 14 **SUPPORT OF APPLE'S MOTION FOR SUMMARY JUDGMENT**

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16 Exhibit to Lin W. Kahn ISO Motion to Seal	17 Title	18 Filed Under Seal/ Redacted
19 I	20 Exhibit 8 to Weatherford Decl., 21 Expert Report of Kevin M. Murphy, 22 Ph.D, with revised exhibits, dated Au- 23 gust 25, 2013 24 • Exhibit 1 and ¶ 20, page 8; 25 • Exhibit 2, page 9; 26 • Exhibit 3, page 11; 27 • ¶¶ 47-48, pages 21-22; 28 • Footnote 57, page 22; • ¶ 52, page 24; • Footnote 105, pages 29-30; • Footnote 110, page 33; • ¶ 86, page 39; • ¶ 88-89, pages 39-40; • Exhibit 4, page 40; • Exhibit 5, page 42; • Footnote 128, page 40; and • Footnote 130, page 41	29 Redacted

J	Exhibit 15 to Weatherford Decl., Portions of the transcript of the deposition of Brian Croll, dated March 22, 2013	Redacted
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EXHIBITS ACCOMPANYING DECLARATION OF CHRISTINA BROWN IN SUPPORT OF DEFENDANTS' JOINT MOTION TO STRIKE IMPROPER REBUTTAL TESTIMONY IN DR. LEAMER'S EXPERT REPORTOR, IN THE ALTERNATIVE, FOR LEAVE TO SUBMIT A REPLY REPORT OF DR. STIROH

Exhibit to Lin W. Kahn ISO Motion to Seal	Title	Filed Under Seal/ Redacted
K	Exhibit 3 to the Brown Decl., Initial Class Certification Report of Edward E. Leamer, Ph.D., October 1, 2012: <ul style="list-style-type: none"> • Footnote 65, page 17; • Figures 3-4, page 23; • Footnote 101, page 27; • Figure 9 and ¶ 99, page 41; • Footnote 129, page 45; • Footnote 135, pages 45-46; • ¶ 109, page 46; • Footnote 139, page 46; • ¶ 115, page 48; • ¶ 119, page 49; • Footnote 155, page 49; • Footnote 160, page 50; • Footnote 164, page 51; • Figure 10, page 53; • Figure 15, page 59; • Figure 16, page 60; and • Figure 17 and ¶ 133, page 61. 	Redacted
L	Exhibit 4 to the Brown Decl., Reply Expert Report of Edward E. Leamer, Ph.D., December 10, 2012: <ul style="list-style-type: none"> • Footnote 51, page 19; • ¶ 53, page 24; • Footnote 69, page 24; • ¶ 54, page 25; • Figure 1, page 26; 	Redacted

1		• ¶ 62, page 29; • ¶ 63, page 29; • ¶ 64, page 29; • Figure 6, page 42; and • Figure 7, page 43.	
2	M	Exhibit 5 to the Brown Decl., Supplemental Expert Report of Edward E. Leamer, Ph.D., May 10, 2013: • Figure 13, page 23; • Figures 15-18 and ¶¶ 63-64, pages 27-29; • Figure 19, page 31; • Exhibit 1; and • Exhibit 2.	Redacted
3	N	Exhibit 6 to the Brown Decl., Initial Merits Expert Report of Edward E. Leamer, Ph.D., October 28, 2013: • Figure 2, page 5; • Figure 4 and ¶ 36, page 15; and • ¶¶ 42-43, page 18.	Redacted
4	O	Exhibit 7 to the Brown Decl., Expert Report of Lauren J. Stiroh, No- vember 25, 2013: • ¶¶ 20-28, pages 10-14; • ¶ 30, page 14; • ¶ 32, pages 14-15; • Footnote 65, page 14; • Footnote 69, page 15; • ¶¶ 33-36, pages 15-16; • Footnotes 76-79, 81, page 16; • ¶ 38, page 17; • ¶¶ 40-41, page 17; • Footnotes 85-87, pages 17-18; • ¶ 43, page 19; • Footnotes 93-95, 100, page 19; • ¶¶ 45-47, pages 20-21; • Footnotes 102, 104-105, page 20; • ¶¶ 50-58, pages 22-24; • ¶¶ 59-67, pages 25-27; • Footnotes 116-117, page 23; • Footnote 130, page 24; • ¶ 71, page 28; • ¶ 77, page 29; • ¶¶ 79-82, pages 30-31;	Redacted

	<ul style="list-style-type: none"> • Footnote 189, page 36; • ¶¶ 111-112, pages 42-43; • Footnotes 206-207, page 42; • Footnote 210, page 43; • ¶ 121-122, page 46; • Footnote 225, page 46; • ¶ 134-140, pages 50-52; • Footnote 235, page 51; • Footnotes 236-237, page 52; • ¶ 180, page 66; • ¶ 193, page 70; • ¶ 201, page 72; • ¶ 206, page 74; • ¶ 209, page 75; • Exhibit III.3-16, 19-32, 34-40, 41-55; • Exhibit IV.1, 3-5, 7-13, 14, 15, 16, 19, 20-24, 26-30, 33, 35-37, 39, 40; • Exhibit V.5; • Exhibit VII.3; and • Appendix Exhibit III.1 	
P	<p>Exhibit 8 to the Brown Decl., Reply Expert Report of Edward E. Leamer, Ph.D., December 11, 2013:</p> <ul style="list-style-type: none"> • Table of Contents, page i; • Table 1, page 3; • Figure 2, page 13; • ¶ 6, page 77; • ¶ 31, page 15; • Table 3, page 19; • Figures 6-7, pages 22-24; • ¶ 42, page 23; • Heading 2 and ¶ 43, page 25; • Figure 8, page 27; • ¶ 47, page 28; • Table 4, page 30; • ¶¶ 64-65, pages 37-38; • Figure 12, page 40; • Figure 14, page 44; and • Appendix A, pages 76-77. 	Redacted

1 **EXHIBITS ACCOMPANYING DECLARATION OF CHRISTINA BROWN IN SUP-**
 2 **PORT OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE EXPERT TESTIMO-**
 3 **NY OF EDWARD E. LEAMER, PH.D.**

4 5 Exhibit to Lin W. Kahn ISO Motion to Seal	6 7 Title	8 9 Filed Under Seal/ Redacted
10 11 Y	12 Exhibit 3 to the Brown Decl., 13 Portions of the transcript of the deposition of Edward Leamer, Ph.D., conducted on November 18, 2013: 14 <ul style="list-style-type: none"> • 955:20-25; • 956:1-11, 17-20, and 23-24; and • 958:16-23. 	15 Redacted
16 17 Q	18 Exhibit 5 to the Brown Decl., 19 Initial Class Certification Report of Edward E. Leamer, Ph.D., October 1, 2012: 20 <ul style="list-style-type: none"> • Footnote 65, page 17; • Figures 3-4, page 23; • Footnote 101, page 27; • Figure 9 and ¶99, page 41; • Footnote 129, page 45; • Footnote 135, pages 45-46; • ¶109, page 46; • Footnote 139, page 46; • ¶115, page 48; • ¶119, page 49; • Footnote 155, page 49; • Footnote 160, page 50; • Footnote 164, page 51; • Figure 10, page 53; • Figure 15, page 59; • Figure 16, page 60; and • Figure 17 and ¶133, page 61. 	21 Redacted
22 23 R	24 Exhibit 6 to the Brown Decl., 25 Reply Expert Report of Edward E. Leamer, Ph.D., December 10, 2012: 26 <ul style="list-style-type: none"> • Footnote 51, page 19; • ¶53, page 24; • Footnote 69, page 24; • ¶54, page 25; 	27 Redacted

1		• Figure 1, page 26; • ¶ 62, page 29; • ¶ 63, page 29; • ¶ 64, page 29; • Figure 6, page 42; and • Figure 7, page 43.	
2	S	Exhibit 7 to the Brown Decl., Supplemental Expert Report of Edward E. Leamer, Ph.D., May 10, 2013: • Figure 13, page 23; • Figures 15-18 and ¶¶ 63-64, pages 27-29; • Figure 19, page 31; • Exhibit 1; and • Exhibit 2.	Redacted
3	T	Exhibit 8 to the Brown Decl., Initial Merits Expert Report of Edward E. Leamer, Ph.D., October 28, 2013: • Figure 2, page 5; • Figure 4 and ¶ 36, page 15; and • ¶¶ 42-43, page 18.	Redacted
4	U	Exhibit 9 to the Brown Decl., Reply Expert Report of Edward E. Leamer, Ph.D., December 11, 2013: • Table 1, page 3; • Figure 2, page 13; • ¶ 31, page 15; • Table 3, page 19; • Figures 6-7, pages 22-24; • ¶ 42, page 23; • Table 4, page 30; • Figures 9-11, pages 36-37; • ¶¶ 64-65, pages 37-38; • Figure 12, page 40; • Figure 14, page 44; and • Appendix A, pages 76-77.	Redacted
5	Z	Exhibit 114 to Brown Decl., Expert Report of Lauren J. Stiroh, No- vember 25, 2013: • Exhibit 114.	Redacted
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IT IS SO ORDERED.

Date: _____

HONORABLE LUCY H. KOH
United States District Court Judge